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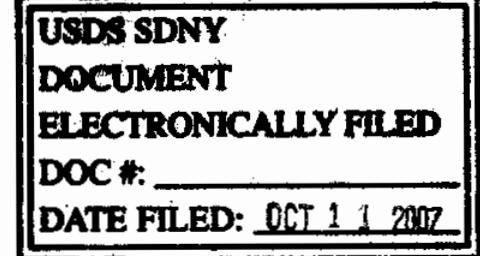
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October 9, 2007

Via First Class Mail

Hon. Paul A. Crotty
United States District Courthouse – SDNY
500 Pearl Street, Room 735
New York, NY 10007-1312



Re: Acosta v. American Sales & Management Organization Corporation et al
SDNY Case No. 07-6326 (PAC)(FM)
Our File: 2032-31

Dear Judge Crotty:

We represent American Sales & Management Organization Corporation (hereinafter “ASMORG”) in the above-captioned action. We write because we are on an expedited discovery schedule and, although we have met the deadlines to date, we now find that we will not be able to adhere to the remainder of the discovery deadlines and request an extension of all deadlines.

First, a brief summary of the case: it arises out of an incident at JFK Airport, New York, on July 29, 2004. Plaintiff Carmen Acosta was a passenger aboard an American Airlines flight from Puerto Rico. Plaintiff alleges that while being carried from her seat into a wheelchair by airline personnel, she was dropped. Plaintiff was paraplegic and disabled prior to the Incident. Plaintiff’s paraplegia was the result of an operation in Puerto Rico in 2001.

We served discovery demands on Plaintiff and Plaintiff responded. The alleged injuries include, but are not limited to, herniated discs, impingement of the shoulder, and degenerative disc disease. After reviewing the medical records produced, we noted that Plaintiff had fallen six months prior to the subject Incident. In addition, films were taken of her spine in 2002. No Authorizations were produced for medical records prior to the subject accident including for the medical facility in Puerto Rico. We have spoken with Plaintiff’s counsel who has said he will provide Authorizations to us from 2001 through the present but there is no possible way in which we can receive the Authorizations, the medical records and films, and have Plaintiff appear for an IME prior to her scheduled deposition or prior to the deadline for depositions. Plaintiff’s deposition is scheduled for October 18, 2007. The deadline for depositions to be completed is November 2, 2007. The parties believe that Plaintiff’s complex medical

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history, some for which records are in Puerto Rico, "presents unique complexities or other exceptional circumstances."

Therefore, all parties respectfully request the following deadline extensions:

Civil Case Management Plan	Current Deadline	Requested Extension
Discovery - depositions to be completed no later than:	November 2, 2007	March 3, 2008
Motion to Amend or to join additional parties to be filed no later than:	November 5, 2007	March 4, 2008
Parties to meet to confer on scheduled for expert disclosures no later than:	November 6, 2007	March 5, 2008
All fact discovery to be completed no later than:	December 6, 2007	April 4, 2008
Date recommended by counsel for alternate dispute resolution:	December 6, 2007	April 4, 2008
All counsel to meet face-to-face to discuss settlement no later than:	December 20, 2007	April 18, 2008
All expert discovery to be completed no later than:	January 21, 2008	May 20, 2008

Respectfully submitted,

Louis R. Martinez (LM 9155)

LRM/nm

cc: Dirk Marschhausen, Esq.
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Attorney for Plaintiff

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Attorney for Defendant
American Airlines, Inc.

Application GRANTED and the
November 5 conference will be adjourned to a date in February, 2008.
The parties are on notice that no further extension will be granted, and that they should be prepared for trial on June, 2008.

SO ORDERED: 10/11/07

HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE